

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 22cr10050
	)	
v.	)	Violations:
	)	
ISABEL RODRIGUEZ,	)	<u>Count One</u> : Engaging in the Business of
	)	Dealing in Firearms Without a License
	)	(18 U.S.C. § 922(a)(1)(A))
Defendant	)	
	)	<u>Count Two</u> : Making False Statements to
	)	Acquire a Firearm from a Licensed Dealer
	)	(18 U.S.C. § 922(a)(6))
	)	
	)	<u>Firearm Forfeiture Allegation</u> :
	)	(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))
	)	

INDICTMENT

COUNT ONE

Engaging in the Business of Dealing in Firearms Without a License  
(18 U.S.C. § 922(a)(1)(A))

The Grand Jury charges:

On or about diverse dates between January 29, 2021, and November 8, 2021, in  
Framingham, Lowell, Boston and elsewhere in the District of Massachusetts, the defendant,

ISABEL RODRIGUEZ,

not being a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United  
States Code, did willfully engage in the business of dealing in firearms, including a Glock,  
Model 19, 9mm pistol, bearing serial number ADFV836.

All in violation of Title 18, United States Code, Section 922(a)(1)(A).

COUNT TWO

Making False Statements to Acquire a Firearm from a Licensed Dealer  
(18 U.S.C. § 922(a)(6))

The Grand Jury further charges:

On or about January 29, 2021, in Framingham, in the District of Massachusetts, the defendant,

ISABEL RODRIGUEZ,

in connection with the acquisition of a firearm, to wit: a Glock, Model 19, 9mm pistol, bearing serial number ADFV836, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement to the licensed firearm dealer, which statement was intended and likely to deceive the licensed firearm dealer, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, United States Code, in that ISABEL RODRIGUEZ represented on a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearm Transaction Record, to the effect that he was the actual transferee/buyer of the said firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual transferee/buyer of the firearm.

All in violation of Title 18, United States Code, Section 922(a)(6).

FIREARM FORFEITURE ALLEGATION  
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 922, set forth in Counts One and Two, the defendant,

ISABEL RODRIGUEZ,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offense. The property to be forfeited includes, but is not limited to, the following:

- a. a Glock, Model 19, 9mm pistol, serial number ADFV836;
- b. a Sig Sauer, Model P320, 9mm pistol, serial number TC047116;
- c. a Taurus, Model G3C, 9mm pistol, serial number ABM250536;
- d. a Citadel 12-gauge shotgun, serial number 21-36494; and
- e. one (1) extended pistol magazine and three (3) rifle magazines.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

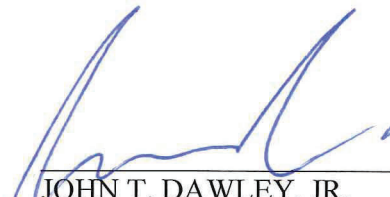
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL

  
FOREPERSON

  
JOHN T. DAWLEY, JR.  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: MARCH 3, 2022  
Returned into the District Court by the Grand Jurors and filed.

/s/ Leonardo T. Vieira - signed at 1:40pm  
DEPUTY CLERK